

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

ANTONIO GALLEGOS, KRISTIAN PETTINE,
ANDRE GALLEGOS, and K. L. P. L., a minor child,

Plaintiffs,

vs.

Case No. 1:12-CV-224-LH/KBM

CITY OF ESPAÑOLA, a municipal corporation,
JOE MARTINEZ, individually and in his official capacity;
JEREMY APODACA, individually and in his official capacity;
ROBERT VIGIL, individually and in his official capacity;
CITY OF ESPANOLA OFFICERS and SUPERVISORS JOHN DOES 1 through 10,
individually and in their official capacities.

Defendants.

**NATHANIEL THOMPKINS' RESPONSE TO
PLAINTIFF'S MOTION [DOC. 226]**

COME NOW, the New Mexico Firm, LLC [Nathaniel V. Thompson] and for
the Firm's Response to Plaintiff's Motion [Doc.226], states as follows:

1. New Mexico Firm, LLC, denies the allegations set forth in Plaintiff's Motion;
2. On March 11, 2015, the New Mexico Firm, mailed, certified return receipt requested, Exhibit A.
3. Exhibit A provided Plaintiff Ms. Pettine with a copy of an Invoice for Legal Services in her criminal case; a Final Cost Statement in the civil case; and a signed settlement sheet for Andre Gallegos' case;
4. The letter and return receipt card have not been returned to our offices and therefore we presume that Plaintiff Kristian Pettine did not pick-up the certified letter; and
5. The letter notified Plaintiff Kristian Pettine that her file has been prepared and is ready for her to pick-up at our offices. The Firm advised Plaintiff Pettine to contact the office

and let us know when she would like to pick-up her file. Since the mailing of this letter, we have not heard from Plaintiff Pettine or received any telephone calls.

WHEREFORE, counsel for Plaintiffs respectfully requests that the Court dismiss Plaintiff frivolous motion.

Dated: March 17, 2015

Respectfully Submitted:

NEW MEXICO FIRM, LLC

By: /s/ Nathaniel V. Thompkins
Nathaniel V. Thompkins
103 N. St. Francis Drive, Unit A
Santa Fe, NM 87501
(505) 988-9750
Former Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of March, 2015, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

E-mail: mbasham@bbpcnm.com
Mark Basham
2205 Miguel Chavez Road, Suite A
Santa Fe, NM 87505
Attorneys for Defendants

Via U.S. Mail to:

Kristian Pettine and Antonio Gallegos
3504 Anderson S.E.
Albuquerque, NM 87106

/s/ Nathaniel V. Thompkins
Nathaniel V. Thompkins